

KENNETH G. HAUSMAN (Bar No. 57252)
kenneth.hausman@arnoldporter.com
DANIEL B. ASIMOW (Bar No. 165661)
daniel.asimow@arnoldporter.com
DAVID J. REIS (Bar No. 155782)
david.reis@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
Three Embarcadero Center, 10th Floor
San Francisco, CA 94111-4024
Telephone: 415.471.3100
Facsimile: 415.471.3400

WILLIAM J. BAER (appearance *pro hac vice*)
bill.baer@arnoldporter.com
JONATHAN I. GLEKLEN (appearance *pro hac vice*)
jonathan.gleklen@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave, NW
Washington, D.C. 20001-3743
Telephone: 202.942.5000
Facsimile: 202.942.5999

Attorneys for Defendant THE OAKLAND
RAIDERS, a California limited partnership

JOHN E. HALL (Bar No. 118877)
jhall@cov.com
GREGG H. LEVY (appearance *pro hac vice*)
glevy@cov.com
DEREK LUDWIN (appearance *pro hac vice*)
dludwin@cov.com
BENJAMIN J. RAZI (appearance *pro hac vice*)
brazi@cov.com
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: 202.662.6000
Facsimile: 202.662.6291

Attorneys for Defendants THE NATIONAL
FOOTBALL LEAGUE and all NFL Clubs other
than The Oakland Raiders

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CITY OF OAKLAND,

Plaintiff,

vs.

THE OAKLAND RAIDERS, a California
limited partnership; ARIZONA CARDINALS
FOOTBALL CLUB LLC; ATLANTA
FALCONS FOOTBALL CLUB, LLC;
BALTIMORE RAVENS LIMITED
PARTNERSHIP; BUFFALO BILLS, LLC;
PANTHERS FOOTBALL, LLC; THE
CHICAGO BEARS FOOTBALL CLUB, INC.;
CINCINNATI BENGALS, INC.; CLEVELAND
BROWNS FOOTBALL COMPANY LLC;
DALLAS COWBOYS FOOTBALL CLUB,
LTD; PDB SPORTS, LTD; THE DETROIT
LIONS, INC.; GREEN BAY PACKERS, INC.;
HOUSTON NFL HOLDINGS, LP;
INDIANAPOLIS COLTS, INC.;
JACKSONVILLE JAGUARS, LLC; KANSAS

Case No.: 3:18-cv-07444-JCS

Action Filed: December 11, 2018

**STIPULATION AND [PROPOSED] ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE AND BRIEFING
SCHEDULE**

The Honorable Joseph C. Spero

CITY CHIEFS FOOTBALL CLUB, INC.;
CHARGERS FOOTBALL COMPANY, LLC;
THE RAMS FOOTBALL COMPANY, LLC;
MIAMI DOLPHINS, LTD.; MINNESOTA
VIKINGS FOOTBALL, LLC; NEW
ENGLAND PATRIOTS LLC; NEW ORLEANS
LOUISIANA SAINTS, LLC; NEW YORK
FOOTBALL GIANTS, INC.; NEW YORK
JETS LLC; PHILADELPHIA EAGLES, LLC;
PITTSBURGH STEELERS LLC; FORTY
NINERS FOOTBALL COMPANY LLC;
FOOTBALL NORTHWEST LLC;
BUCCANEERS TEAM LLC; TENNESSEE
FOOTBALL, INC.; PRO-FOOTBALL, INC.;
and THE NATIONAL FOOTBALL LEAGUE,

Defendants.

STIPULATION

Plaintiff City of Oakland (“Plaintiff”) and Defendants the NFL and its thirty-two member clubs (“Defendants”), through their respective attorneys of record herein, enter into this Stipulation with reference to the following circumstances:

1. On December 11, 2018, Plaintiff filed its complaint against Defendants in City of Oakland v. The Oakland Raiders, et al., Case No. 3:18-cv-07444-JCS in the Northern District of California (the “Complaint”);

2. On December 11, 2018, this matter was assigned to Judge Joseph C. Spero;

3. On December 20, 2018, Judge Spero issued a Case Management Scheduling Order, which set an initial Case Management Conference for March 15, 2019;

4. On January 7, 2019, the Parties entered into a stipulation extending Defendants’ time to answer or otherwise respond to the Complaint until March 1, 2019;

5. On February 19, 2019, Plaintiff provided Defendants with a draft Case Management Conference Statement that contained a proposed schedule including dates for the service of initial document demands and interrogatories, and Plaintiff has indicated that it will not attempt to advance those dates;

6. Defense counsel has a scheduling conflict on March 15, 2019, and Plaintiffs are not opposed to a continuance of the Case Management Conference; and

7. Defendants intend to move to dismiss the Complaint. The Parties wish to agree to a briefing schedule regarding Defendants’ motion.

Accordingly, IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel and subject to Court approval as follows:

1. The Case Management Conference is reset to March 22, 2019, with all associated dates, including the date for filing the Case Management Conference Statement, adjusted accordingly;

2. Plaintiff’s Opposition to the Motion to Dismiss will be due on April 3, 2019;

3. Defendant’s Reply in Support of the Motion to Dismiss will be due on April 17, 2019; and

4. Defendants will notice the Motion to Dismiss for hearing on May 17, 2019.

IT IS SO STIPULATED.

Dated: February 22, 2019.

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Daniel B. Asimow
DANIEL B. ASIMOW

Attorneys for Defendant
THE OAKLAND RAIDERS

Dated: February 22, 2019.

COVINGTON & BURLING LLP

By: /s/ John E. Hall
JOHN E. HALL

Attorneys for Defendants
THE NATIONAL FOOTBALL LEAGUE
and all NFL Clubs other than The Oakland
Raiders

Dated: February 22, 2019.

PEARSON, SIMON & WARSHAW, LLP

By: /s/ Clifford H. Pearson
CLIFFORD H. PEARSON

Attorneys for Plaintiff
CITY OF OAKLAND

SIGNATURE ATTESTATION

I, Daniel B. Asimow, am the ECF user whose user ID and password are being utilized to electronically file this **STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE AND BRIEFING SCHEDULE** ("Stipulation"). Pursuant to Local Rule 5-1(i)(3), I hereby attest that the other signatories have concurred in this filing.

Dated: February 22, 2019.

/s/ Daniel B. Asimow
DANIEL B. ASIMOW

ORDER

IT IS SO ORDERED.

DATED: _____

HONORABLE JOSEPH C. SPERO
Chief Magistrate Judge